

1 Ramon Rossi Lopez - rlopez@lopezmchugh.com  
(California Bar Number 86361; admitted *pro hac vice*)  
2 Lopez McHugh LLP  
100 Bayview Circle, Suite 5600  
3 Newport Beach, California 92660  
949-812-5771

4 Mark S. O'Connor (011029) – moconnor@beusgilbert.com  
5 BEUS GILBERT, PLLC  
701 N.44th St.  
6 Phoenix AZ 85008  
480-429-3019  
7 *Co-Lead/Liaison Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products  
11 Liability Litigation

No. MD-15-02641-PHX-DGC

12 **PLAINTIFF'S NOTICE OF LODGING**  
13 **CERTAIN DOCUMENTS UNDER SEAL**  
14 **REGARDING PLAINTIFF'S MOTIONS**  
***IN LIMINE NOS. 2 AND 4***

15  
16 Pursuant to LRCiv 5.6(d), Plaintiff submits this Notice of Lodging Certain  
17 Documents Under Seal regarding Plaintiff's Response to Defendants' Brief Regarding  
18 Reconsideration of Issues Decided in the *Booker* Matter.

19 Plaintiff provides notice that, pursuant to LRCiv 5.6(d), she has lodged with the  
20 Court the documents listed on Exhibit A to this Notice.

21 Defendants contend that the documents listed in Exhibit A are confidential and  
22 should be filed under seal. As required under LRCiv 5.6(d), Plaintiff certifies that on  
23 March 29, 2019, the parties met and conferred in good faith and were unable to agree  
24 about whether the documents are confidential under the Protective Order and should be  
25 filed under seal. Plaintiff does not believe that the disputed documents warrant continued  
26 confidential treatment as proprietary or sensitive trade secret information.

27 This dispute notwithstanding, the parties have agreed to continue to meet and  
28 confer on the documents at issue.

1 RESPECTFULLY SUBMITTED this 29th day of March, 2019.

2 BEUS GILBERT, PLLC

3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor (011029)

5 701 N.44th St.

6 Phoenix AZ 85008

7 LOPEZ McHUGH LLP

8 Ramon Rossi Lopez (CA Bar No. 86361)

9 (admitted *pro hac vice*)

10 100 Bayview Circle, Suite 5600

11 Newport Beach, California 92660

12 *Co-Lead/Liaison Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of March, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine

**EXHIBIT A**

Ex. C to Plaintiff's Motion *in Limine* No. 2: Vena Cava Size

Ex. D to Plaintiff's Motion *in Limine* No. 4: Bard's Internal Rates Based on Reporting Rates of Filter Complications